

EXHIBIT 3

Melvyn A. Anhalt, M.D.

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT WEST VIRGINIA
3 CHARLESTON DIVISION
4) Master File
5 IN RE: ETHICON, INC.,) No. 2:12-MD-02327
6 PELVIC REPAIR SYSTEM) MDL No. 2327
7 PRODUCTS LIABILITY)
8 LITIGATION) JOSEPH R. GOODWIN
9) U.S. DISTRICT JUDGE
10)
11 THIS DOCUMENT RELATES TO)
12 PLAINTIFFS:)
13)
14 Karen and Joel Forester)
15 2:12-cv-00486)
16)
17 Melissa and Charles)
18 Clayton)
19 2:12-cv-00489)
20)
21 Bonnie Blake and Larry)
22 Miketey)
23 2:12-cv-00995)
24)
Cherise and Marty)
Springer)
2:12:cv-00997)
Angela and Bradley)
Morrison)
2:12-cv-00800R)

17 *****
18 *****
19 ORAL DEPOSITION OF
20 MELVYN A. ANHALT, M.D.
21 APRIL 2, 2016
22 *****
23 *****
24 *****

1 ORAL DEPOSITION OF MELVYN A. ANHALT, M.D.,
2 produced as a witness at the instance of the
3 DEFENDANTS, and duly sworn, was taken in the
4 above-styled and numbered cause on the 2nd of April,
5 2016, from 7:59 a.m. to 11:35 a.m., before Tamara
6 Vinson, CSR in and for the State of Texas, reported by
7 machine shorthand, at Hilton Houston Westchase, 9999
8 Westheimer Road, Ambassador Room, Houston, Texas,
9 77042, pursuant to the Federal Rules of Civil
10 Procedure and the provisions stated on the record or
11 attached hereto.

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A P P E A R A N C E S

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ALSO PRESENT:

Ms. Tamara Vinson, Court Reporter

1 Transobturator and a variety of different journals.

2 Q. Okay. Is this the reliance list or materials
3 that you relied upon with respect to your report?

4 A. These are articles that I have seen summaries
5 of or I have read. I have subscribed to a thing that
6 relate -- I put in what I'm interested in and every
7 time there's an article that appears in any journal I
8 get a summary of it. It's called Medscape.

9 Q. Medscape the thing that you said you
10 subscribe to?

11 A. Yes, ma'am.

12 Q. Okay.

13 A. And so many of these I've read the summary,
14 I've read the purpose of the article, but I haven't
15 read the entire article. Some of these I have.

16 Q. Okay.

17 A. Most of what I relied upon was my experience.

18 Q. Your personal experience --

19 A. My personal experience.

20 Q. Just wait until I finish. I'm sorry, Doctor.

21 A. I'm sorry.

22 Q. Your personal experience in your care and
23 treatment of patients?

24 A. Yes, ma'am.

1 Q. Okay. And the articles that are cited in
2 here, are these all articles that you have come to
3 know through the Medscape service that you subscribe
4 to?

5 A. Most of them.

6 Q. Okay. Are any of the articles articles that
7 the lawyers have provided to you?

8 A. You know, I haven't gone over this list in
9 its entirety. I've pulled up the Medscape, went
10 through that, and I can't tell you that there's not
11 one or two that they added to it, because I haven't
12 gone back and reviewed every one of these articles.

13 Q. Okay.

14 A. Okay. So the answer is I don't know.

15 Q. That's fair. You had mentioned that you
16 subscribe to Medscape and you put in what you want --
17 I think you said what you want to search for?

18 A. Yes.

19 Q. And do you -- do you have it set up so that
20 it sends you a periodic alert if there is a new
21 article on a topic of interest to you?

22 A. Almost every day.

23 Q. Okay. And in what --

24 A. It comes on my cell phone.

1 Q. Okay. So you get a notification --

2 A. Uh-huh.

3 Q. -- or an e-mail?

4 A. Yes.

5 Q. And what topics do you have it triggered to
6 alert you on?

7 A. Not many.

8 Q. Okay.

9 A. One is atrial fibrillation, which I have
10 periodically, so I'm interested in any new articles
11 about that. And stress incontinence is number two.
12 And three is prolapse. Those are the only ones that I
13 get articles on. And then I read everything I
14 subscribe to, the journal Urology, I subscribe to the
15 Journal of Urology. Urology and the Journal of
16 Urology are two separate journals.

17 Q. Okay.

18 A. And I -- the office subscribes to a number of
19 other journals and I will pick them up and survey them
20 and see if there's anything that interests me, and I
21 will often read articles in those journals.

22 Q. Okay.

23 A. And the other point of where I get my
24 information and a big source of my information is I go

1 to the AUA every year, American Urological Association
2 meeting, and I spend a lot of time in poster sessions,
3 in listening to lectures, and anything new is in the
4 big session in the -- there are thousands of people
5 there. It's an extremely educational environment.

6 Q. Okay. Did you do any independent searches
7 for additional articles, other than --

8 A. No, ma'am.

9 Q. -- than those that have appeared in here?

10 A. No, ma'am.

11 Q. Okay. Did you review any internal Ethicon
12 documents?

13 A. No, ma'am.

14 Q. Did you ask for any internal Ethicon
15 documents?

16 A. No, ma'am.

17 Q. Okay. Do you know if Ethicon offered any
18 documents for you -- internal documents for you to
19 review?

20 A. No, they did not.

21 Q. Okay. Did you review any of plaintiffs'
22 expert reports in putting together your report?

23 A. Yes, I did.

24 Q. Which plaintiffs' experts?

Melvyn A. Anhalt, M.D.

1 THE STATE OF TEXAS:
COUNTY OF FT. BEND:

2

3 I, Tamara Vinson, a Certified Shorthand
Reporter and Notary Public in and for the State of
4 Texas, do hereby certify that the facts as stated by
me in the caption hereto are true; that the above and
5 foregoing answers of the witness, MELVYN A. ANHALT,
M.D., to the interrogatories as indicated were made
before me by the said witness after being first duly
6 sworn to testify the truth, and same were reduced to
typewriting under my direction; that the above and
7 foregoing deposition as set forth in typewriting is a
full, true, and correct transcript of the proceedings
8 had at the time of taking of said deposition.

9 I further certify that I am not, in any
capacity, a regular employee of the party in whose
10 behalf this deposition is taken, nor in the regular
employ of his attorney; and I certify that I am not
11 interested in the cause, nor of kin or counsel to
either of the parties.

12

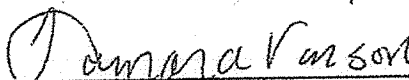
13 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on
this, the 6 day of April, 2016.

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Tamara Vinson, Texas CSR No. 3015

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Expiration Date: 12-31-2016

19

20 GOLKOW TECHNOLOGIES, INC.

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